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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15

16 IN RE PACIFIC FERTILITY CENTER
LITIGATION
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Case No. 3:18-cv-01586-JSC

**DECLARATION OF ALDEN
ROMNEY IN SUPPORT OF CHART'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

Judge: Hon. Jacqueline S. Corley

1 I, Alden Romney, declare as follows:

2 1. I am a consultant with, and previously Chief Executive Officer of, Pacific MSO,
3 LLC. I submit this declaration in support of Chart's Administrative Motion to File Under Seal
4 related to Chart's Motion for Summary Judgment. I make this declaration based on personal
5 knowledge. If called as a witness, I would testify to the facts set forth below.

6 2. I have reviewed the following documents and confirmed that the portions
7 identified below merit sealing:

Document	Portions to Be Sealed
Exhibit B to Ringel Declaration in Support of Chart's Motion for Summary Judgment (Transcript of October 9, 2019 deposition of Joseph Conaghan)	Page 288, line 8 Last page of index, upper middle section of page referencing term on page 288, line 8

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13 3. Exhibit B to Ringel's Declaration in Support of Chart's Motion for Summary
14 Judgment (Page 288, line 8 and the section of the last page of the index referring to the term on
15 page 288, line 8) contains the confidential patient identification number of one of PFC's patients.
16 PFC and Pacific MSO assign patients identification numbers and this patient identification
17 number is reflected in PFC's confidential patient records. This confidential patient identification
18 number is not publicly known and its confidentiality is strictly maintained.

19 4. Chart's request to seal as it relates to this specific portion of this document is
20 narrowly tailored and merits sealing.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed on January 7, 2021.

23
24 /s/ Alden Romney
25 Alden Romney
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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Erin M. Bosman, attest that concurrence in the filing of this document has been obtained.

Dated: January 8, 2021

/s/ Erin M. Bosman

Erin M. Bosman